## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA Plaintiff,

Criminal no. 21-173 (ADC)

v.

BRIAN BRIONI CASTELLANO (3) Defendant.

## **Motion to continue Change of Plea Hearing**

To the Honorable Court:

Comes now the defendant, Mr. Brioni Castellanos, and respectfully states and prays as follows:

- Mr. Brioni Castellano Change of Plea Hearing is scheduled for this Thursday, December
   2021. (See Docket Entry #100)
- 2. Although efforts have been made to secure Mr. Brioni Castellano's signatures on the corresponding documentation necessary for the hearing in time, transportation issues and scheduling conflicts have impeded that Mr. Brioni Castellano and the undersign meet in person.
- 3. In an effort to avoid taking up the Court's time on the day of the hearing, it is requested that the Change of Plea Hearing be continued.
- 4. The undersigned is available on:
  - a. Wednesday, December 15, 2021, 1:00 pm 2:30 pm;
  - b. Thursday December 16, 2021, 8:00 am 12:00 pm;
  - c. Friday December 17, 2021, 9:00 am 5:00 pm.

**WHEREFORE**, we ask the Court to take note of the information herein, and grant the requested continuance to one of the dates proposed by the undersigned.

## RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 7th day of December 2021.

**I HEREBY CERTIFY**, that on this date the present document has been filed electronically and is available for viewing and downloading from the Court's CFM/ECF system by U.S. Attorney's Office.

s/ Diego H. Alcalá Laboy
Diego H. Alcalá Laboy
PO Box 12247
Tel.: (787) 432-4910
USDC-PR No. 300504
dalcala@defensorialegal.com